

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRANDON SMIETANA and SKYCOIN  
GLOBAL FOUNDATION LIMITED, a  
Singapore company, and SYMBOLIC  
ANALYTICS INC. a Delaware Corporation

Plaintiffs,

v.

BRADFORD STEPHENS, AARON  
KUNSTMAN, HARRISON GEVIRTZ, f/k/a  
“HaRRO”, RYAN EAGLE, ANDREW YOUNG,  
FAR AHEAD MARKETING, JOEL WAYNE  
CUTHRIELL f/k/a “JOEL”, MORGAN PECK,  
TRISTAN GREENE, BRYAN CLARK,  
CATHERINE BYERLY, STEVEN LEONARD,  
JOSH OGLE, and UNKNOWN INDIVIDUALS  
AND COMPANIES

Defendants.

Case No.: 1:22-cv-00708

**DEFENDANT FAR AHEAD MARKETING’S  
NOTICE OF MOTION AND MOTION TO  
DISMISS UNDER FEDERAL RULE OF  
CIVIL PROCEDURE 12(b)(2) FOR LACK  
OF PERSONAL JURISDICTION**

Presentment Date: April 7, 2022  
Time: 1:45 p.m.  
Location: 1403

Hon. Sara L. Ellis

**NO ORAL ARGUMENT UNLESS  
REQUESTED BY THE COURT**

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE THAT Defendant Far Ahead Marketing, LLC (improperly named as Far Ahead Marketing) will and hereby does move this Court for an order dismissing all Counts against it under Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction. Through that this motion, Far Ahead Marketing, LLC requests to be completely dismissed from this case. This motion is made under the Federal Rules of Civil Procedure 12(b)(2) and is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities in support thereof, the Declaration of Joshua Ogle and attached exhibits, all pleadings and papers on file in this action, and upon such other matters as may be presented to the Court at the time of the hearing should the Court order oral argument.

PLEASE TAKE NOTICE THAT on April 7, 2022 at 1:45 p.m. or as soon thereafter as Far Ahead Marketing, LLC may be heard, it will appear through its Counsel of Record that is specially appearing on its behalf to present the above referenced motion, before the Honorable Judge Sara L. Ellis of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago, Illinois to present the above referenced Motion.

Dated: April 1, 2022

MORELLO LAW, P.C.

By: /s/ Justin A. Morello  
JUSTIN A. MORELLO (CA SB# 239250)

Attorneys Specially Appearing for Defendant  
Far Ahead Marketing, Inc.